

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF OKLAHOMA**

IN RE:)	
)	
GREEN COPPER HOLDINGS, LLC)	CASE NO. 25-10088-T
EIN # xx-xxx9708)	Chapter 7
)	
)	
Debtor.)	

**TRUSTEE’S REQUEST FOR ORDER AUTHORIZING SALE OF ASSETS AND
WAIVER OF 14-DAY STAY PURSUANT TO FED. R. BANKR. P. 6004(h)**

Comes now the Trustee and states:

1. *The Trustee filed herein his AMENDED MOTION FOR ORDER AUTHORIZING SALE OF SUBSTANTIALLY ALL OF THE ASSETS OF THE ESTATE OUTSIDE NORMAL COURSE OF BUSIENSS CONSISTING OF REAL ESTATE AND PERSONAL PROPERTY FREE AND CLEAR OF LIENS, CLAIMS, ENCUMBRANCES OR INTERESTS PURSUANT TO 11 U.S.C. § 363(f) AND FOR ORDER AUTHORIZING PAYMENT OF REALTOR COMMISSION AT TIME OF CLOSING WITHOUT FURTHER NOTICE* (Doc. No. 68) (“Motion”). The Motion seeks authority to sell specified real estate and personal property to McFarlin Building LLC (“McFarlin”) for the sum of \$1.4 million pursuant to an Asset Purchase Agreement (APA) attached as an exhibit to the Motion.

2. In connection with the filing of the Motion, the Trustee also filed his *TRUSTEE’S AMENDED NOTICE PURSUANT TO FED. R. BANKR. PRO. 6004 AND 2002(a)(2) AND LOCAL RULE 6004-1 OF SALE OF SUBSTANTIALLY ALL ASSETS OF THIS ESTATE CONSISTING OF REAL PROPERTY AND PERSONALTY FREE AND CLEAR OF ALL*

LIENS CLAIMS AND ENCUMBRANCES PURSUANT TO 11 U.S.C. § 363 (Doc. No. 69)
(the “Notice.”)

3. The Trustee provided Notice of the Motion to all necessary and interested parties as evidenced by his Certificate of Service (Doc. No. 70).
4. The Trustee subsequently filed his *TRUSTEE’S SUPPLEMENT TO MOTION AND NOTICE OF SALE* (Doc. No. 75) (the “Supplement”) which provided a partial inventory of the Personalty to be sold. The sale of personal property shall include but is not limited to the assets described in the Supplement.
5. The Trustee served the Supplement on all necessary and interested parties as evidenced by his Certificate of Service (Doc. No. 79).
6. In addition to the Notice provided by the Trustee, the estate’s realtor, Cushman & Wakefield, provided notice to approximately 180 prospective bidders.
7. Finally, and as noted in the Declaration of David Payne (“Payne”) attached hereto as **Exhibit A**, Payne provided Notice to over 800 prospective bidders.
8. No objections or competitive bids were submitted on or before April 28, 2025, as provided in the Notice.
9. The proposed sale is fair and equitable and in the best interests of this estate.
10. The Trustee additionally seeks an order of this Court waiving the 14-day stay pursuant to Fed. R. Bankr. P. 6004(h). In support of that request, the Trustee states that the none of

the Price Tower assets is insured given the estate's inability to secure such insurance. The real estate has no utilities including power. There is water in certain parts of the building. In order to avoid the risk of damage to the property and in the interests of maximizing the value of the Price Tower Assets the Trustee requests that the 14-day stay be waived.

11. Simultaneous with the filing of this pleading, the Trustee has submitted a proposed order to the Court approving the proposed sale pursuant to the terms and conditions of the Motion.

Respectfully Submitted By:

s/ Patrick J. Malloy III
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